

MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MATHEW V. JOHN, JR.
Assistant Corporation Counsel
Labor and Employment Law Division
Telephone: (212) 356-1941
E-mail: matjohn@law.nyc.gov

MEMO ENDORSED

July 3, 2025

Via ECF

Honorable Barbara C. Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 740
New York, New York 10007

Application GRANTED. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Barbara Moses".

Barbara Moses
United States Magistrate Judge
July 7, 2025

Re: *Patty Carambot, Ph.D. v. New York City Health and Hospitals Corporation, et al.*
Case No. 1:24-cv-00841-JPO-BCM

Dear Judge Moses:

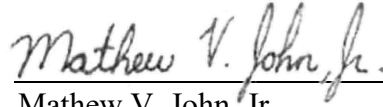
I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. I represent Defendants the New York City Health and Hospitals Corporation d/b/a NYC Health + Hospitals, the City of New York, Patricia Yang, Ph.D., Virginia Fineran, Ph.D., and Jessica Laboy in the above-referenced action.

In accordance with Your Honor's May 7, 2025 Order, *see* ECF No. 56, I write on behalf of both parties to jointly provide the Court with a status update regarding the parties' mediation that occurred on June 26, 2025. The parties did not settle the case during the mediation session. Plaintiff made a revised settlement demand, which the parties and the mediator agreed Defendants would respond to via email to the mediator, on or before July 31, 2025. The parties and the mediator have agreed that, if necessary to further facilitate settlement, they will reconvene for a second mediation session.

In further accordance with Your Honor's May 7, 2025 Order, *see* ECF No. 56, the parties respectfully request that the time for the parties to contact Your Honor's chambers to schedule a case management conference be extended until August 7, 2025, and that the date for the parties to exchange automatic disclosures required by Fed. R. Civ. P. 26(a)(1) be extended until August 14, 2025. The requested extensions are necessary as the undersigned has resigned from the New York City Law Department, effective July 18, 2025, and this case will be reassigned to another Assistant Corporation Counsel. Such additional time will allow the new Assistant Corporation Counsel to calendar any conference date in accordance with his or her calendar, and

also provide him or her additional time to become familiar with the case, including any settlement efforts. We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Mathew V. John, Jr." is positioned above a horizontal line.

Mathew V. John, Jr.
Assistant Corporation Counsel

cc: Via ECF
Samuel O. Maduegbuna, Esq.
Attorney for Plaintiff
Maduegbuna Cooper, L.L.P.
30 Wall Street, 8th Floor
New York, New York 10005
Telephone: (212) 232-0155
E-mail: sam.m@mcande.com